

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

WAH SING (US) TRADING)	
LIMITED, LLC D/B/A EASYBIT,)	Civil Action No. 1:16-cv-0504
)	
Plaintiff,)	
)	
DEDRIC DUNCAN,)	
)	
Defendant.)	

**JOINT MOTION FOR EXTENSION OF TIME TO FILE A JOINT
PRELIMINARY REPORT AND DISCOVERY PLAN**

Plaintiff Wah Sing (US) Trading Limited, LLC d/b/a Easybit (“Plaintiff”) and Defendant Dedric Duncan (“Defendant”) hereby jointly move, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), for an extension of time to file a Joint Preliminary Report and Discovery Plan (“JPRDP”) until Friday, May 13, 2016. In support of this Joint Motion, the parties show the Court as follows:

1. On April 21, 2016, the Court will hold a preliminary injunction hearing (the “Hearing”) (Dkt. 8) on Plaintiff’s Motion for Temporary Restraining Order (Dkt. 3).
2. The parties believe that the Court’s ruling and guidance at the Hearing may impact the terms of the JPRDP, which is currently due on April 18, 2016.

3. Therefore, the parties seek a brief extension, from April 18 to May 13, to complete the JPRDP.

WHEREFORE, the parties respectfully request that this Joint Motion be granted in its entirety and that the deadline for the JPRDP be extended from April 18, 2016 to May 13, 2016.

For the convenience of the Court, a [Proposed] Order is attached.

This 14th day of April, 2016.

TAYLOR ENGLISH DUMA LLP

/s/Eric S. Fisher

Michael Eric Ross

GA Bar No. 615190

Eric S. Fisher

GA Bar No. 250428

Taylor English Duma, LLP

1600 Parkwood Circle, Suite 400

Atlanta, GA 30339

Telephone: (770) 434-6868

Facsimile: (770) 434-7376

mross@taylorenghish.com

efisher@taylorenghish.com

*Counsel for Plaintiff Wah Sing (US) Trading
Limited, LLC d/b/a EasyBit*

LOBER, DOBSON & DESAI, LLC

/s/Michael Jordan Lober

Michael Jordan Lober

GA Bar No. 455580

3410 Overland Drive

Roswell, GA 30075
Telephone: (678) 461-9800
Facsimile: (678) 461-9944
mjlober@lddlawyers.com

Counsel for Defendant Dedric Duncan

LOCAL RULE 7.1D CERTIFICATION

I hereby certify that the foregoing complies with the font and point requirements of LR 5.1, to wit, this brief was prepared in Times New Roman font, 14-point type.

TAYLOR ENGLISH DUMA LLP

/s/*Eric S. Fisher*

Eric S. Fisher

GA Bar No. 250428

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing *JOINT MOTION FOR EXTENSION OF TIME TO FILE A JOINT PRELIMINARY REPORT AND DISCOVERY PLAN* with the Clerk of Court using the CM/ECF system, which will effectuate service of same upon the following attorneys of record:

Michael Jordan Lober
Lober, Dobson & Desai, LLC
3410 Overland Drive
Roswell, GA 30075
Telephone: 678-461-9800
Facsimile: 678-461-9944
mjlober@lddlawyers.com

Counsel for Defendant

This 14th day of April, 2016,

/s/Eric S. Fisher

Eric S. Fisher
GA Bar No. 250428

Counsel for Plaintiff